

## **Appendix 10:**

## **Enhanced Plan Crosswalk**

**Instructions for Using the Attached Plan Review Crosswalk for Review of Enhanced State Hazard Mitigation Plans**

Attached is a Plan Review Crosswalk based on the **Multi-Hazard Mitigation Planning Guidance Under the Disaster Mitigation Act of 2000**, published by FEMA, dated March 2004. This Plan Review Crosswalk is consistent with the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Part 201 – Mitigation Planning, Interim Final Rule* (the Rule), published February 26, 2002.

**SCORING SYSTEM**

**N – Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

**S – Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

Each requirement includes separate elements. All elements of a requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a summary score of "Satisfactory."

The example below illustrates how to fill in the Plan Review Crosswalk.

**Example**

**Effective Use of Available Mitigation Funding**

**Requirement §201.5(b)(3):** *[The Enhanced Plan **must** demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the Enhanced Plan demonstrate how the State is effectively using existing programs to achieve its mitigation goals?	Section VI, pp. 2-3	The plan only lists existing hazard mitigation programs.  <b>Required Revisions:</b> <ul style="list-style-type: none"> <li>Describe how the programs in place have reduced losses from natural hazards.</li> </ul>	✓	
SUMMARY SCORE			✓	

**ENHANCED STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK COMBINED PANEL REVIEW 08-25-2006**

State: Commonwealth of Virginia

Date of Plan (Date of Letter to Region): 11/10/2006

**Enhanced State Hazard Mitigation Plan Review and Approval Status**

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<b>FEMA Reviewer:</b>	<b>Title:</b>	<b>Date:</b>
<b>Date Received in FEMA Region III</b>		
<b>Plan Not Approved</b>		
<b>Plan Approved</b>		
<b>Date Approved</b>		
<b>GENERAL REVIEW NOTES</b>	<p>The Standard Plan has been significantly updated and revised; approval has been requested per letter from the State Coordinator November 10, 2006.</p> <p>Sections 1.1, 1.3, 1.5, 1.6, 2.1, 2.2, 2.5, 2.8, 2.9, 3.1, 3.2, 3.4, 4.5, 5.1, 5.3, 5.4, 6.1, 6.2, have been significantly revised and updated following a review of progress during summer, 2006 at the 18-month post-approval mark.</p> <p>State standard plan supportive data base has been updated to include local HIRA information from 30% of the approved local/regional plans. The HIRA will continue to be maintained and updated as funds become available. In addition, several new key state databases have been incorporated into VDEM GIS data layers. These include state health facility critical facilities and several other key weather-related databases. Once all local HIRA data has been assimilated, development of a new vulnerability assessment algorithm will be developed to more comprehensively address state-wide hazards.</p> <p>Appendices are referenced at the end of Chapter 1 and throughout the Standard and Enhanced Plan where applicable.</p> <p>Chapter 2 page numbering has been corrected. Commonwealth revisions are in blue.</p>	

**ENHANCED STATE HAZARD MITIGATION PLAN SUMMARY CROSSWALK**

The plan cannot be approved if the plan has not been formally adopted.

Each requirement includes separate elements. All elements of the requirement must be rated "Satisfactory" in order for the requirement to be fulfilled and receive a score of "Satisfactory." Elements of each requirement are listed on the following pages of the Plan Review Crosswalk. Reviewer's comments must be provided for requirements receiving a "**Needs Improvement**" score.

**SCORING SYSTEM**

Please check one of the following for each requirement

**N – Needs Improvement:** The plan does not meet the minimum for the requirement. Reviewer's comments must be provided.

**S – Satisfactory:** The plan meets the minimum for the requirement. Reviewer's comments are encouraged, but not required.

**Prerequisite**

Compliance with Standard State Plan Requirements:  
§201.5(b)

NOT MET	MET
	X

**Comprehensive State Hazard Mitigation Planning Program**

Integration with Other Planning Initiatives: §201.5(b)(1)

Project Implementation Capability: §201.5(b)(2)(i) and (ii)

Program Management Capability: §201.5(b)(2)(iii A-D)

Assessment of Mitigation Actions: §201.5(b)(2)(iv)

Effective Use of Available Mitigation Funding: §201.5(b)(3)

Commitment to a Comprehensive Mitigation Program:  
§201.5(b)(4)(i-vi)

N	S
	X
	X
	X
	X
	X
	X

**ENHANCED STATE HAZARD MITIGATION PLAN APPROVAL STATUS**

PLAN NOT APPROVED

☐

PLAN APPROVED

☐

See Reviewer's Comments

# ENHANCED STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK COMBINED PANEL REVIEW 08-25-2006

State: Commonwealth of Virginia

Date of Plan (Date of Letter to Region): 11/10/2006

## PREREQUISITE

### Compliance with Standard State Plan Requirements

**Requirement §201.5(b):** *Enhanced State Mitigation Plans must include all elements of the Standard State Mitigation Plan identified in §201.4 ...*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			NOT MET	MET
A. Does this Enhanced Plan meet all the Standard State Mitigation Plan requirements?	Chapters 1-6 Standard State Plan	<b>The Standard Plan has been fully reviewed, updated and revised. Sections 1.1, 1.3, 1.5, 1.6, 2.1, 2.2, 2.5, 2.8, 2.9, 3.1, 3.2, 3.4, 4.5, 5.1, 5.3, 5.4, 6.1, 6.2, have been significantly revised during fall, 2006. Appendices J, K, 3, 10, 11 and 13 have been revised or added. A summary list of Standard and Enhanced Plan revisions and updates has been provided with the revised plan chapters and appendices.</b>		<b>X</b>
SUMMARY SCORE				<b>X</b>

## COMPREHENSIVE STATE HAZARD MITIGATION PLANNING PROGRAM

### Integration with Other Planning Initiatives

**Requirement §201.5(b)(1):** *[An Enhanced Plan must demonstrate] that the plan is integrated to the extent practicable with other State and/or regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans) and FEMA mitigation programs and initiatives that provide guidance to State and regional agencies.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the Enhanced Plan demonstrate how it is integrated to the extent practicable with other State and regional planning initiatives (comprehensive, growth management, economic development, capital improvement, land development, and/or emergency management plans)?	Section 7.2.1 Pgs 7-2 to 7-8; Section 2.8 & 7-17 to 7-22  Chapter 2 & 5 of Standard State Plan	<ul style="list-style-type: none"> <li>The Plan describes the role of Regional Planning Districts in assisting with the development of local mitigation plans, and clearly states the RPDs do not have land use or regulatory authority. The State appears to have strong PDC (Planning District Commissions) to provide technical and planning support to the localities within their respective regions, and a strong state wide building code that address both new and existing construction. The Enhanced plan (7.2) states that involvement of Virginia planning district commissions in the development of all-hazard mitigation plan ensures a regional integration of mitigation planning into other planning efforts.</li> <li>Chapter 2 of the State Plan describes and lists state and local programs, policies and statutes which address natural hazards; however, the documentation in Section 2.1 also states that the final Commonwealth Emergency Operations Plan, Volume 6: Standard Hazard Mitigation Plan "does not attempt to fully integrate ongoing</li> </ul>		<b>X</b>

		<p>state and local programs due to the delay caused by the events of 9/11/01.” State agencies with Mitigation roles and functions are described in Section 2.9, and Table 2-1 provides a good description of State Agencies involved in mitigation.</p> <ul style="list-style-type: none"> <li>The Plan describes local planning initiatives (eg., comprehensive planning), but does not describe how mitigation or the Enhanced Plan are specifically integrated with these other initiatives. For example, how the comprehensive plans are linked to the State Mitigation Plan. Hazards are referenced, but it is not clear how mitigation strategies, plan actions, etc. are supported by these other planning initiatives – or if they are, it is very general. A better description of how the Plan is/will be integrated into State and local planning initiatives is needed to demonstrate progress in the future. <b>A brief description of local comprehensive plans and how the local hazard mitigation plan goals and strategies might be integrated into comprehensive plans is provided on page 7-2. It should be noted that local governments do not often view these programs holistically and VDEM planning staff will continue to strive planning program connectivity through VDEM support local plan implementation (page 5.9)</b></li> </ul> <p><b>RECOMMENDED REVISIONS:</b></p> <ul style="list-style-type: none"> <li>Demonstrate how the Enhanced Plan mitigation actions are linked to State and local initiatives. The plan update should describe in section 7.2.1 any relationship between the local comprehensive plans and the mitigation plans done by the PDC’s, and that plan updates show how State agencies support the goals and objectives of this plan. The next update to the State plan may include examples of state and regional planning initiatives, economic development and/or other current emergency management plans to the extent possible. <b>There are presently few linkages in the Commonwealth as described above because local planning is delegated to local governments. An expanded description is provided in section 7.2.1. A database has been developed of all goals, objectives and strategies listed in the 27 local/regional plans. This is sorted by county, city and town, which will facilitate incorporation of appropriate strategies into revisions of comprehensive plans (Appendix 11).</b></li> <li>Provide information on how often PDC’s meet for the purpose of Hazard Mitigation (ex., how often the PDCs meet). <b>See page 5.9.</b></li> <li>Provide the number of jurisdictions that participate in the NFIP. <b>275 communities participate in the NFIP (pages 7-7 and 7-11).</b></li> </ul>		
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<p>B. Does the Enhanced Plan demonstrate how it is integrated to the extent practicable with FEMA mitigation programs and initiatives that provide guidance to State and regional agencies?</p>	<p>Enhanced Plan Page 7-4 / Section 7 pp. 7-2 to 7-8 Appendix 7</p> <p>State Standard Plan Chapter 2 (2.9.2) Section 2.8 and 2.9 2-10 to 2-6 (page numbers do not track) Appendix D Chapter 4</p>	<ul style="list-style-type: none"> <li>Plan briefly describes FEMA mitigation programs and some of the Commonwealth activities under each. Some of them show connections to the Plan and to specific Mitigation Strategies, but there seems to be missing linkages here. <b>Descriptions of FEMA-Commonwealth programs have been expanded in Sections 2.8, 2.9, 4.5.1, and 7.2 to include more in-depth discussion of FEMA grant programs, CDGB, floodplain management, NFIP and post-disaster recovery programs.</b></li> <li>The State Plan states that “during the past decade of state and federal budget challenges, full funding and staffing of programs has been rare”</li> <li>Impressed by how easy it was to find PDMc information and SHMO contact information on web through VA planning website, which I believe demonstrates successful outreach to the planning community. The plan misses that Norfolk is a “Tsunami Ready” community and the “Storm Ready” communities are out of date. <b>Storm Ready and Tsunami Ready communities have been updated on page 7-11.</b></li> <li>Although there was an integrated State approach to mitigation and flood map modernization planning based on Virginia Tech publications, there was no description in this section of how the mitigation strategies can support implementation of the State’s Flood Map Modernization program. The potential to integrate with State Capital Improvement planning was not discussed in this section. <b>A variety of program integration opportunities, including capital improvement projects, disaster resistant university plan implementation, map modernization, etc. are discussed in section 7.2.1 beginning on page 7-6. It must be recognized that the state floodplain management strategic plan was developed concurrent with the standard mitigation plan and the map modernization strategy was developed after the standard mitigation plan. Both are considered “stand alone” program plans administered by another state agency, so extensive integration is not deemed necessary as goals and objectives would become redundant. In addition, FEMA mitigation grant funds can no longer support flood studies or FIRM replacement. Additional expansion of discussion of floodplain management programs can be found in chapter 2 and a digital copy of the state’s floodplain management plan has been provided as Appendix 13.</b></li> <li>This plan demonstrates an integration with FEMA and other Federal Agency Programs with respect to Hazard Mitigation in Chapter 7, pp 7-8 to 7-19</li> </ul> <p><b>REQUIRED REVISION:</b></p> <ul style="list-style-type: none"> <li>The Plan must describe the implementation of FEMA mitigation programs consistent with the plan (with the coordination of agencies</li> </ul>		
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SUMMARY SCORE

X

### Project Implementation Capability

**Requirement §201.5(b)(2)(i) and (ii):** [The Enhanced Plan **must** document] the State's project implementation capability, identifying and demonstrating the ability to implement the plan, including:

- Established eligibility criteria for multi-hazard mitigation measures.
- A system to determine the cost effectiveness of mitigation measures, consistent with OMB Circular A-94, Guidelines and Discount Rates for Benefit-Cost Analysis of Federal Programs, and to rank the measures according to the State's eligibility criteria.

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the Enhanced Plan demonstrate that the State has established eligibility criteria for multi-hazard mitigation measures?	Enhanced Plan Section 7.2.2.1 pp 7-7 to 7-9 Appendix K Appendix 3 Chapter 7-4  State Plan Chapter 4	<ul style="list-style-type: none"> <li>Plan references HMGP eligibility criteria, and post-disaster strategies developed in the JFO as their basis.</li> <li>Yes, the State has demonstrated that it has established eligibility criteria for multi-hazard mitigation measures</li> <li>The Enhanced plan demonstrated that the State had an established criteria system for mitigation measures.</li> <li>Adequately demonstrated in Chapter 7, pp 7-8;</li> <li>Appendix K (detailed criteria); Appendix 3 (forms list criteria)</li> </ul> <p><b>Appendix 3 has been expanded to include information on other FEMA-Commonwealth mitigation programs as well as the Commonwealth's ranking process.</b></p>		X
B. Does the Enhanced Plan indicate that the State has a system in place for determining the cost effectiveness of mitigation measures, consistent with OMB Circular A-94?	Section 7.2.2.1 pp 7-7 to 7-15 Appendix 2 Appendix 6	<ul style="list-style-type: none"> <li>Plan describes in house benefit-cost technical capabilities and available training for new staff.</li> <li>State outlines how it supports BCA, including training, and outreach to the University was an excellent idea.</li> <li>Yes, the State uses the FEMA Benefit to Cost Flood Model and other methods to determine cost effectiveness.</li> <li>Good job.</li> <li>The Enhanced plan's system of determining the cost effectiveness of mitigation measures, described the project review process "a rigorous protocol designed to evaluate and track eligibility, benefit cost, funding levels, project time frames, and reasons for denying an application." Many projects submitted were eliminated during the VDEM application screening process. An example was given of 105 projects submitted for DR-1491 Hurricane Isabel, 40 projects only (38%) were deemed ineligible and not submitted to FEMA.</li> <li>Adequately demonstrated in Chapter 7, pp 7-9, 7-13 to 7-15; Appendix 2; Appendix 6</li> </ul>		X



# ENHANCED STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK COMBINED PANEL REVIEW 08-25-2006

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C. Does the Enhanced Plan indicate that the State has a system in place to rank the measures according to the State's eligibility criteria?	<p>Section 7.2.2.2 Appendix K 7-8 to 7-9 Appendix K Mitigation Strategies</p> <p>Appendix H</p> <p>State Plan Chapter 4.2.1</p> <p>Enhanced Plan Appendix K-10</p> <p>Chapter 7, pp 7-9 to 7-15; Appendix K</p>	<ul style="list-style-type: none"><li>• The Plan does not describe a system to rank measures, only references the Structural Mitigation Strategy Committee to review and prioritize activities. <b>Ranking of HMGP project applications dating to 2002 begins on page 7-23. Ranking score criteria and score sheets have been added to Appendix 3.</b></li><li>• The ranking system shown on Page K-11 is very subjective and does not lend itself to a standardized ranking system. <b>See Appendix 3.</b></li><li>• Not sure how the State ranks projects – on benefit cost? The Mitigation Strategies reference the mitigation plan, but language in the plan should clearly reference the process that creates the mitigation strategies – and that the strategies are based on the basic goals and objectives of the mitigation plan?</li><li>• Found Appendix H, referenced on page 4-3 that has activities and projects in the plan ranked High, Medium, and Low – could this be the basis for the system to rank measures? This does not provide enough information to determine how they are ranked.</li></ul> <p><b>REQUIRED REVISION</b></p> <ul style="list-style-type: none"><li>• The Plan does not describe a system to rank measures, only references the Structural Mitigation Strategy Committee to review and prioritize activities. Additional information is necessary to determine how criteria are reviewed and prioritized – that is, the ranking system - by the State. This may be based on the four (a-d) ranking criteria listed on Page K-11, but no way to determine the ranking of project applications with these criteria.</li><li>• May want to look at how other States are prioritizing and ranking their activities, such as Wisconsin and Florida (point systems). NOTE: This does not have to be a point system, but a clear explanation of how projects are prioritized.</li><li>• <b>The Commonwealth has been ranking projects on disaster-specific criteria when the demand for funding exceeds funds available, which has not always been the case. A disaster-by-disaster history for the past 4 years is provided in the body of Chapter 7, as well as flow charts that provide the HMGP and other grant timelines and processes. Ranking points protocols and ranking sheets used by VDEM staff and the Structural Mitigation sub-committee are provided in Chapter 7 and Appendix 3.</b></li></ul>		
SUMMARY SCORE				X

Program Management Capability

**Requirement §201.5(b)(2)(iii A-D):** *[The Enhanced Plan **must** demonstrate] that the State has the capability to effectively manage the HMGP as well as other mitigation grant programs, [and provide] a record of the following:*

- *Meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation;*
- *Preparing and submitting accurate environmental reviews and benefit-cost analyses;*
- *Submitting complete and accurate quarterly progress and financial reports on time; and*
- *Completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the Enhanced Plan describe the State's capability to effectively manage the HMGP as well as other mitigation grant programs?		<b><i>[See Regional Certification to Determine Score]</i></b>		<b>X</b>
B. Does the Enhanced Plan provide a record for meeting HMGP and other mitigation grant application timeframes and submitting complete, technically feasible, and eligible project applications with appropriate supporting documentation?		<b><i>[See Regional Certification to Determine Score]</i></b>		<b>X</b>
C. Does the Enhanced Plan provide a record for preparing and submitting accurate environmental reviews and benefit-cost analyses?		<b><i>[See Regional Certification to Determine Score]</i></b>		<b>X</b>
D. Does the Enhanced Plan provide a record for submitting complete and accurate quarterly progress and financial reports on time?		<b><i>[See Regional Certification to Determine Score]</i></b>		<b>X</b>
E. Does the Enhanced Plan provide a record for completing HMGP and other mitigation grant projects within established performance periods, including financial reconciliation?		<b><i>[See Regional Certification to Determine Score]</i></b>		<b>X</b>
SUMMARY SCORE				<b>X</b>

Assessment of Mitigation Actions

**Requirement §201.5(b)(2)(iv):** *[The Enhanced Plan **must** document the] system and strategy by which the State will conduct an assessment of the completed mitigation actions and include a record of the effectiveness (actual cost avoidance) of each mitigation action.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S
A. Does the Enhanced Plan describe the system and strategy by which the State will conduct an assessment of the completed mitigation actions?	Section 7.2.2.4 pp. 7-14 to 7-16 7-18 to 7-23	<ul style="list-style-type: none"> <li>System described is excellent for projects prior to 2005, but needs to describe how it will continue in the future.</li> <li>Their described assessment strategy relies on a database of past projects, but it is not clear if the effort had been completed at the time of writing the strategy. They cite data limitations as a result of poor historic BCA documentation that has impacted losses avoided work nationally. Methodologies adapted by the MMC and HAZUS have worked around these data limitations using statistical approaches and could be considered. <b>The data base is complete but population of photographs and GPS coordinates is ongoing as more than 1,200 properties must be visited and documented.</b></li> <li>The VADEM has an extensive grants database that is used to manage the financial reimbursements of HMGP, PDM and FMA projects. The Enhanced plan document very well the system and strategy the state used to assess completed mitigation actions as well as the financial management of Federal grants. The plan cited the use of HAZUS flood and wind modules, benefit-cost analysis reports from which data was extrapolated used to estimate cost savings from floods, which occurred following mitigation. In addition with FEMA Region III, they are conducting site visits to conduct a comprehensive inventory.</li> <li>Yes, the State Plan contains a strategy for conducting an assessment of the completed mitigation actions.</li> <li>Adequately demonstrated in Chapter 7, pp 7-18 to 7-20</li> </ul> <p><b>RECOMMENDED REVISION:</b></p> <ul style="list-style-type: none"> <li>Strategy should encompass how future projects will be addressed, and extend to multi-hazards, not just flooding.</li> </ul>		X

<p>B. Does the Enhanced Plan describe the system and strategy by which the State will include a record of the effectiveness (i.e. actual cost avoidance) of each mitigation action?</p>	<p>Section 7.2.2.4 Section 7.2.2.4 pp. 7-14 to 7-16. 7-18 to 7-23 Appendix 6</p>	<ul style="list-style-type: none"> <li>• System described is excellent for projects prior to 2005, but needs to describe how it will continue in the future. <b>VDEM has funded flood, wind, surge, severe weather and human-caused hazard planning and structural projects through HMGP. FMA is limited to flooding projects and to date the Commonwealth has not succeeded in obtaining PDM structural project funding (Table 7-3 page 7-23 and page 7-35.)</b></li> <li>• The plan works through and presents an actual losses avoided example that makes this section more powerful. They appear to have conflicting statements on when losses avoided work will be implemented. One statement appears to indicate going forward after every event: "The database will also be used to support cost-avoidance information development for all future flood, wind and hurricane events." They may want to reword for use in disasters rather than commit to study all future events. The strategy should include working with other agencies to obtain high water mark data at project locations rather than relying completely on gage data.</li> <li>• Yes, the State Plan contains a system and strategy (Riverine Data Full Model) for recording the effectiveness of each mitigation action related to flood damage avoidance.</li> <li>• The Enhanced Plan states that a variety of methods are being used to calculate the long-term benefits of structural mitigation projects. The plan also cited the use of benefit-cost analysis reports to estimate cost savings.</li> <li>• Adequately demonstrated in Chapter 7, pp 7-18 to 7-20</li> </ul> <p><b>RECOMMENDED REVISION:</b></p> <ul style="list-style-type: none"> <li>• Strategy should encompass how future projects will be addressed, and extend to multi-hazards, not just flooding.</li> <li>• <b>See page 7-34 to 7-35 for additional information on using the described methodology to assess 2006 presidential disasters as well as future declared disasters. Other agencies do provide high water mark data, several have now been listed.</b></li> </ul>		<p><b>X</b></p>
<p>SUMMARY SCORE</p>				<p><b>X</b></p>

**ENHANCED STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK    COMBINED PANEL REVIEW 08-25-2006**

State: Commonwealth of Virginia

Date of Plan (Date of Letter to Region): 11/10/2006

## Effective Use of Available Mitigation Funding

**Requirement §201.5(b)(3):** *[The Enhanced Plan **must** demonstrate] that the State effectively uses existing mitigation programs to achieve its mitigation goals.*

Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S

**ENHANCED STATE HAZARD MITIGATION PLAN REVIEW CROSSWALK COMBINED PANEL REVIEW 08-25-2006**

State: Commonwealth of Virginia

Date of Plan (Date of Letter to Region): 11/10/2006

<p>A. Does the Enhanced Plan demonstrate how the State is effectively using existing programs to achieve its mitigation goals?</p>	<p>Section 7.2.3 pp. 7-17 to 7-22 Section 2.9.2 Section 2.2.2.3</p> <p>State Plan – Chapter 2&amp; 4</p> <p>Enhanced Plan 7.2.1</p>	<ul style="list-style-type: none"> <li>• These three sections combined gave this a satisfactory score – no one Section would pass for this requirement.</li> <li>• Page 7-16: 88 Properties were reviewed but only 21 BCA's were conducted. The remaining BCA's were apparently done by FEMA, however this is not completely clear .<b>Page 7-29 has been clarified to describe the number of properties evaluated by VDEM staff using Benefit-Cost modules as well as the number of multiple-property projects.</b></li> <li>• Plan provides a good narrative, but need more specific information. Would like to see chart or table summarizing FMA \$ made available and obligated (narrative suggests reasons for not obligating funds – but more specifics might be helpful). <b>See Appendix 3.</b> Good discussion of PDM applications and how they are successful. Would also like chart or table on HMGP funds available after each declaration, as well as obligations made. Chapter 2 gives a good summary of other Federal Agency programs, and in the future, the State might want to delve a little deeper into how to leverage these programs to meet the specific goals in the plan.</li> <li>• The VA State and Enhanced plan provides good demonstration of how they have effectively used existing programs to achieve its mitigation goals.</li> <li>• In 7.2.1, the Plan cites how local planning commissions were required to “study use and preservation of land, characteristics and conditions of existing development, natural resources, surface water, geology, environmental and economic factors, existing public facilities, drainage, flood control and flood damage prevention measures, among others. (§15.2.2224, Code of Virginia). “</li> <li>• Adequately demonstrated in Chapter 7, pp 7-21 to 7-23</li> </ul> <p><b>RECOMMENDED REVISION</b></p> <ul style="list-style-type: none"> <li>• Provide more detail for each of the programs managed – Federal and non-Federal. Some detail of programs has been provided. <b>Standard business practices, as dictated by the Virginia Administrative Process Act are used to implement all grant programs at VDEM. VDEM mitigation grant programs have stood up well to rigorous state and federal grant program audits through the years. More information on these requirements can be made available upon request.</b></li> <li>• Clarify how the remaining properties were analyzed for cost effectiveness.</li> </ul>		<p><b>X</b></p>
<p>SUMMARY SCORE</p>				<p><b>X</b></p>

# Commitment to a Comprehensive Mitigation Program

**Requirement §201.5(b)(4)(i-vi):** *[The Enhanced Plan **must** demonstrate] that the State is committed to a comprehensive state mitigation program, which might include any of the following:*

- *A commitment to support local mitigation planning by providing workshops and training, State planning grants, or coordinated capability development of local officials, including Emergency Management and Floodplain Management certifications.*
- *A Statewide program of hazard mitigation through the development of legislative initiatives, mitigation councils, formation of public/private partnerships, and/or other executive actions that promote hazard mitigation.*
- *The State provides a portion of the non-Federal match for HMGP and/or other mitigation projects.*
- *To the extent allowed by State Law, the State requires or encourages local governments to use a current version of a nationally applicable model building code or standard that addresses natural hazards as a basis for design and construction of State sponsored mitigation projects.*
- *A comprehensive, multi-year plan to mitigate the risks posed to the existing buildings that have been identified as necessary for post-disaster response and recovery operations.*
- *A comprehensive description of how the State integrates mitigation into its post-disaster recovery operations.*
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Element	Location in the Plan (section or annex and page #)	Reviewer's Comments	SCORE	
			N	S

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State: Commonwealth of Virginia

Date of Plan (Date of Letter to Region): 11/10/2006

<p>A. Does the Enhanced Plan demonstrate that the State is committed to a comprehensive State mitigation program?</p>	<p>Section 7.4.2 pp. 7-20 to 7-28</p> <p>7.2.4.1</p> <p>7.2.4.3</p> <p>7.2.4.4</p> <p>7.2.4.5</p> <p>7.2.4.6</p> <p>Appendix 8</p> <p>Appendix 9</p>	<ul style="list-style-type: none"> <li>• Excellent summary. This level of detail would benefit all sections of the Enhanced Plan.</li> <li>• They indicate an impressive State 20% match of HMGP funding over the last five years. This is an excellent Plan and the State as a whole has demonstrated the importance of mitigation into local planning mechanisms.</li> <li>• Critical facility hardening is described post 9-11. The State has conducted an impressive amount of mitigation related training. The planning status in regard to FEMA approved plans on Page 22 appears to be out of date. <b>This has been removed since all but one local plan is complete. Current local plan status may be found in Chapter 5.</b></li> <li>• Yes, The State Plan demonstrates that Virginia is Committed to a comprehensive State mitigation program.</li> <li>• The Enhanced Plan demonstrates that the State is committed to a comprehensive State mitigation program and has enacted legislation in the <i>Code of Virginia</i>, §15.2-2223, which states “The comprehensive plan <i>shall be made with the purpose of guiding and accomplishing a coordinated, adjusted and harmonious development of the territory which will, in accordance with present and probable future needs and resources, best promote the health, safety, morals, order, convenience, prosperity and general welfare of the inhabitants .</i>”</li> <li>• Adequately demonstrated in the Standard Plan, and in the Enhanced Plan Chapter 7, pp 7-20 to 7-34, Appendixes 7, 8, &amp; 9, and Appendix H</li> </ul>		<p><b>X</b></p>
SUMMARY SCORE				<p><b>X</b></p>